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Attorneys for Plaintiff
LAURI VALJAKKA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 3:22-cv-01490-JST

**PLAINTIFF’S RESPONSE TO
DEFENDANT NETFLIX, INC.’S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE A NOTICE OF
SUPPLEMENTAL EVIDENCE IN
SUPPORT OF ITS MOTION FOR
PRELIMINARY INJUNCTION**

Judge: Hon. Jon S. Tigar
Date: September 21, 2023
Time: 2:00 p.m.
Crtrm: 6 – 2nd Floor

Pursuant to Civil Local Rule 7-11(b), Plaintiff Lauri Valjakka (“Valjakka”) hereby responds to Defendant Netflix, Inc.’s Administrative Motion For Leave To File A Notice Of Supplemental Evidence In Support Of Its Motion For Preliminary Injunction (ECF 159).

Valjakka does not oppose Netflix's request for leave to file the four pages of the transcript of the deposition of Valjakka's damages expert, Robert Held, that are attached to its motion. However, Valjakka objects to Netflix's characterization of Mr. Held's testimony, and opposes Netflix's argument that the testimony supports Netflix's Motion for A Preliminary Injunction.

Given that there is insufficient time before the hearing on Netflix's Motion for A Preliminary Injunction for Valjakka to seek leave from the Court to introduce evidence in response to the four pages of transcript Netflix seeks permission to file, Valjakka may request leave to do so during the hearing.

Dated: September 15, 2023

Respectfully submitted,

RAMEY LLP

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